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Hearing Date: December 10, 2020 at 10:00 a.m.
Objection Deadline: December 3, 2020 at 4:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

NOTICE OF MOTION TO COMPEL PAYMENT OF PROCEEDS OF POST-PETITION SALES OF CONSIGNMENT GOODS TO SCENTS OF WORTH, INC.

PLEASE TAKE NOTICE that a hearing (the “Hearing”) to consider the annexed motion (the “Motion”)² of Scents of Worth, Inc. (“SOW”) seeking entry of an order compelling

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LL/C (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innoval Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

compliance by the above-captioned debtors and debtors in possession (collectively, the “Debtors”) with this Court’s *Interim Order Approving (i) Procedures for Store Closing Sales and (ii) Assumption of Liquidation Consulting Agreement* [ECF # 337] (the “Interim Store Closing Order”) and *Final Order Approving (i) Procedures for Store Closing Sales and (ii) Assumption of Liquidation Consulting Agreement* [ECF # 823] (the “Final Store Closing Order” or, together with the Interim Store Closing Order, the “Store Closing Orders”), will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, Courtroom 118, 300 Quarropas Street, White Plains, New York, 10601 (the “Bankruptcy Court”) on **December 10, 2020 at 10:00 a.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be in writing, and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Bankruptcy Court, and shall be served in accordance with the *Amended Order Implementing Certain Notice and Case Management Procedures* [ECF # 405] (the “Amended Case Management Order”), and shall be served upon all parties contained in the most current Master Service List (as that term is defined in the Amended Case Management Order) and upon counsel for SOW, Cozen O’Connor, 277 Park Avenue, New York, New York 10172 (Attn.: Frederick E. Schmidt, Jr., Esq.), so as to be received no later than **December 3, 2020, at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

Dated: New York, New York
November 12, 2020

COZEN O'CONNOR

By: /s/ Frederick E. Schmidt, Jr.

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